To: DOCUMENTATION CENTER OF TMC TECHNICAL ADMINISTRATION DIV.

Distribution in TMC TMC Request Dept.	CQE - Mr. Yokoyama (Cover page only) Q1 - Mr. Ogata QL - Mr. Kato	Page	1/5
		TMC Report No.	
		TMA Report No.	UK0709WQ -
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Dist. in affiliates	TMS: CS Mr. Sunakawa PQSS Mr. Zellers, Mr. Aoki, Mr. Morino, Mr. Yamamoto  TEMA: QD Mr. Ono, Mr. Arai, Mr. Triantafyllos, Mr. Ross CQE-LA Mr. Hirata  TCI: Mr. Stremler	Report Date	September 26, 2007
TITLE	Defect information Report: All Weather Floor Mat	Originated: C. Santucq Reviewed: K. Ro Approved: C. Tinto	- out-

#### Summary:

On September 26, TMA filed the attached Defect Information Report (DIR) with NHTSA regarding a voluntary safety campaign of certain Toyota and Lexus optional equipment all weather floor mats. The mats subject to the campaign were optional equipment for the 2007 - 2008 MY Lexus ES350 and Toyota Camry. To address NHTSA's concerns raised in the defect investigation (EA07-010), Toyota is recalling the driver position all weather floor mat. NHTSA has received 17 complaints regarding unintended acceleration on the 2007 Lexus ES350, and noted that an unsecured all weather floor mat can trap the accelerator pedal, resulting in significant unwanted acceleration.

TMA negotiated with NHTSA and reached this agreement with the agency in order to address the issue. While the all weather floor mat cannot interfere with the accelerator pedal if properly secured with the retention clips, Toyota is aware that in some cases, the mat was unsecured due to being placed on top of the carpeted floor mat. In this particular case, Toyota did not determine the existence of a safety related defect with the mat or the vehicles, but is complying with the regulations for safety related defects. This campaign is being filed as an equipment recall of the mats themselves, not the vehicles in which these mats were available as optional equipment. Only the 2007 - 2008 MY Lexus ES350 and Toyota Camry driver side all weather floor mats are included in this campaign at this time.

All known owners of 2007 - 2008 MY Lexus ES350 and Toyota Camry vehicles will be sent a campaign letter, and if they have purchased the all weather floor mats, they will be eligible for a no-charge replacement of the driver side mat when it becomes available. Mailings will begin in early October.

<u>Attachment</u>	Defect Information Report		



### TOYOTA MOTOR NORTH AMERICA, INC.

WASHINGTON OFFICE

601 THIRTEENTH STREET, NW, SUITE 910 SOUTH, WASHINGTON, DC 20005

TEL: (202) 775-1700 FAX: (202) 463-8513

September 26, 2007

Mr. Daniel C. Smith Associate Administrator for Enforcement National Highway Traffic Safety Administration 1200 New Jersey Avenue, SE Washington, DC 20590

Re: Toyota and Lexus Optional Equipment All Weather Floor Mat

Part 573, Defect Information Report

Dear Mr. Smith:

On behalf of Toyota Motor Corporation ["TMC"], we hereby submit the attached Defect Information Report concerning a voluntary safety campaign of certain Toyota and Lexus Optional Equipment All Weather Floor Mats.

Toyota has carefully evaluated the agency's concerns in the defect investigation EA07-010 and has concluded that the subject vehicles do not contain a safety related defect. With respect to the All Weather Floor Mats that are associated with the field incidents reported in EA07-010, Toyota concluded that the mats do not contain a safety-related defect; however, Toyota agrees that an unsecured All Weather Floor Mat, especially one that is stacked on top of another floor mat, can migrate toward the accelerator pedal, potentially preventing it from returning to idle. To address this issue, and to resolve the agency's concerns in the defect investigation EA07-010, Toyota is submitting the information called for in Part 573 of your regulations for an equipment recall.

Toyota will voluntarily comply with all aspects of 49 CFR 577 when conducting the owner notification for this campaign. Should you have any questions about this report, please contact Mr. Chris Santucci at (202) 775-1707.

Sincerely,

TOYOTA MOTOR NORTH AMERICA, INC.

Chris Tinto
Vice President

Vice President

Technical & Regulatory Affairs

CT:cs
Attachment

#### DEFECT INFORMATION REPORT

# 1. <u>Component Controlling Corporation</u>:

Toyota Motor Sales, USA, Inc. ["TMS"] 19001 South Western Avenue, Torrance, CA 90509

### **Actual Component Manufacturer:**

Thermoflex Corporation 1535 S. Lakeside Drive Waukegan, IL 60085 Telephone: 847-473-9011

# 2. <u>Identification of Affected Equipment:</u>

The items of equipment involved are the Lexus/Toyota All Weather Floor Mats sold as an optional accessory mat for certain 2007 and early 2008 model year Lexus ES350 and Toyota Camry vehicles.

Component Name	Part Number	Dates of Manufacture
Lavus/Toyota antional	PT908-33070	January 23, 2006
Lexus/Toyota optional All Weather Floor Mat	PT908-33071	through
All weather Floor Wat	PT908-32070	September 13, 2007

# 3. <u>Total Number of Equipment Potentially Affected</u>:

Approx. 55,000 All Weather Floor Mats

#### 4. Percentage of Equipment Estimated to Actually Contain the Defect:

100%

## 5. Description of Problem:

The subject All Weather Floor Mat (AWFM) is specifically designed for the 2007 and early 2008 model year Lexus ES350 and Toyota Camry vehicles. It includes two grommet holes and retaining hooks (clips) to secure the mat to the vehicle's carpet. If the AWFM is not secured by the retaining hooks (clips) either by itself or if it is placed on top of an existing carpeted floor mat, the mat could move forward during the vehicle usage and it may interfere with the accelerator pedal. In the worst case, the accelerator pedal may temporarily become stuck in a partially depressed position when returning to the idle position. However, if the mat is properly secured, it will not interfere with the accelerator pedal.

## 6. Chronology of Principal Events:

In March 2007, NHTSA opened a Preliminary Investigation (PE07-016) concerning the interference between the AWFM and accelerator pedal on the 2007 model year Lexus ES350 vehicles when the AWFM is placed on top of an existing carpeted floor mat. Toyota studied the issue and concluded that if the AWFM is used by itself and secured properly by the retaining clips (as Toyota instructs in the owner's manual), it cannot interfere with the accelerator pedal. However, to address the issue, Toyota decided to conduct an owner mailing to all owners of 2007 model year Lexus ES350 vehicles from late-April through mid-May, advising the proper use and installation of the AWFM. In addition, Toyota implemented some enhancements on the AWFM and its packaging that further highlight the installation instructions of the AWFM.

In August 2007, NHTSA upgraded the investigation to an Engineering Analysis (EA07-010) based on 17 complaints which NHTSA had received. Toyota believes that the AWFM can never interfere with the accelerator pedal if it is properly secured with the retaining clips as Toyota instructs, and that no defect exists with the AWFM and the vehicles themselves. However, to alleviate the concerns of NHTSA and our customers about safety, and to reduce the possibility that the accelerator pedal may become stuck in a partially depressed position due to interference with the AWFM in the event it is not secured by the retaining clips, Toyota decided to conduct a voluntary safety campaign to replace all of the aforementioned AWFMs with a redesigned one.

### 7. <u>Description of Corrective Repair Action:</u>

All owners of 2007 and early 2008 model year Lexus ES350 and Toyota Camry vehicles will be notified, by first class mail, of the safety campaign and the timing when the replacement AWFM will become available. Once the replacement AWFM is available, a second owner notification will be sent to notify owners to return their AWFM for the driver's seating position to any Lexus/Toyota dealer for an exchange of the AWFM.

Toyota has also stopped the sale of the Toyota/Lexus All Weather Floor Mat designed specifically for 2007 and early 2008 model year Camry and ES 350 vehicles.

## Reimbursement Plan for pre-notification remedies:

The owner letter will instruct owners that have previously paid for the replacement of the subject AWFM for a similar condition prior to this campaign to seek reimbursement by mailing a copy of their repair order, proof-of-payment, and proof-of-ownership for reimbursement consideration.

## 8. <u>Recall Schedule:</u>

First mailing of the owner notification will commence in early October 2007 and will be completed by mid October 2007. The second owner notification will begin mailing in mid-to-late November, 2007.

Copies of the owner notification and dealer instructions will be submitted as soon as they are available.

9.	Distributor/Dealer Notification Schedu	<u>le</u> :		
	Notifications to distributors/dealers will be sent in the end of September 2007.			
	No.			·